

January 8, 2014

To: Bob Zeigler  
SEPA/NEPA Coordinator, WDFW Regulatory Services Section

Dear Mr. Zeigler,

Please consider this our response to the DNS for the Whiskey Dick Winter Range—Seasonal Motor Vehicle Closure. Although the report recommends opening the road from February 1<sup>st</sup> to April 30<sup>th</sup>, the evidence stated in the SEPA Checklist does not support that decision. Conversely, it appears the road should be closed during that period.

Regarding the SEPA checklist, the following statements do not support opening the road:

1. “The overwhelming majority of hunters (74% to 84%) support, or strongly support, using road closures to maintain healthy game populations during critical times of the year.”
2. “From the 2008-2012 Colockum Elk Study, data indicated that with eliminating motorized traffic, elk became less sensitive to road proximity.” (We assume this means the elk are less disturbed.)
3. Dr. McCorquodale’s study also “clearly demonstrated that wintering elk in this region are in marginal physical condition during mid-to-late winter period.” He also wrote that “The scientific evidence is compelling that disturbance associated with traffic on open roads can strongly affect elk distribution and limit use of even highly preferred habitat near roads”.

The area in question was purchased for the purpose of winter range for game and bird habitat. Prior to 2008 some roads were left open and more elk were reported as problems on private agricultural lands. Since the closure of roads in the last five years, elk problems have decreased. This would indicate the opening of roads will again make the problem worse by forcing elk to the west.

Other statements in the SEPA regard the physical status of elk when disturbed. Less body fat and less reserves for the calving season are indicated, which would be another reason for keeping the road closed during the February through April period. It appears the physical status alone could indicate the area roads should be closed earlier, such as November 1<sup>st</sup> or December 1<sup>st</sup>. The SEPA does state that this is the shortest closure compared to other states, so an extended closed period is worth considering.

Another huge concern is the three-mile access through Ginkgo State Park lands. Because of the lack of funding and the shortage of State Parks staff, the monitoring of the gate will

be almost impossible. Therefore, the State Parks land and roads will also be negatively affected with traffic wear on moist roads. State Park gates will have to be perpetually open if they do not have the staff to be gate keepers?

The SEPA mentions creeks and tributaries, wetlands, steep slopes, and roads with increased usage, all of which are likely to suffer negative consequences. From experience we know that very little moisture can cause muddy situations that help destroy roads surfaces. To protect the natural resources, the game, and the habitat, plus lessen future maintenance of roads, the area should be closed a minimum of three months. Again, it appears it would be more beneficial for elk and resources if roads in this area were closed no later than December 1<sup>st</sup> of each year!

The Whiskey Dick Winter Range has been closed to motorized vehicles since 2008, and decisions are presently being made for the soon-to-be released Naneum Ridge to Columbia River Recreation Plan. The SEPA does not support opening the area, and WDFW does not appear to have funds to enforce proper use or monitor the area, nor to improve the roads from damage caused by more usage during wet weather. Please consider closure this year until a permanent plan is developed! .

Sincerely,

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